

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL DOCKET: 1:04-cv-10080-GAO

RALPH VOLLMAN,
Plaintiff,

v.

ROGER LYNN GRUBB and
ALLIED SYSTEMS, LTD.
Defendants.

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ASSENTED TO MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Local Rule 83.5.3(b), the undersigned attorney, who is a member of the bar of this court, hereby respectfully moves the Court to permit Melissa Rotenberg Arcaro, Esq. of the law firm of Halloran & Sage LLP, One Goodwin Square, 225 Asylum Street, Hartford, CT 06103, to appear pro hac vice and to represent the defendant, Allied Systems, Ltd. and Roger Grubb, in all respects of this case, including trial. In support of this motion, the undersigned states the following:

1. Melissa Rotenberg Arcaro was admitted to practice law in the state of Connecticut in 1995. She was also admitted to practice before the United States District Court for the District of Connecticut in 1996.
2. Melissa Rotenberg Arcaro has not been denied admission or disciplined in accordance with Local Rule 85.5.3 by any court.

3. The undersigned states that he has conferred with Melissa Rotenberg Arcaro and that he understands and believes that Ms. Arcaro has read, and is familiar with, the Local Rules of the United States District Court for the District of Massachusetts.

4. Additionally, the undersigned respectfully states that he understands and believes that Melissa Rotenberg Arcaro and the law firm of Halloran & Sage LLP has a specialized knowledge of the defendants' affairs which is important to the defense of this action.

5. Finally, a signed affidavit of Melissa Rotenberg Arcaro is attached hereto as Exhibit A in support of this motion for the Court's convenience and consideration.

6. Counsel for the plaintiff does not object to this Motion.

WHEREFORE, the undersigned respectfully moves this honorable Court to allow Melissa Rotenberg Arcaro, Esq., to appear and to participate in this action pro hac vice, in all respects, and at trial.

REQUEST FOR ORAL ARGUMENT

The defendants respectfully request oral argument of this motion if deemed necessary by the Court.

Date: January 28, 2005

Respectfully submitted,

By: 

N. Kane Bennett of
HALLORAN & SAGE, LLP
One Goodwin Square
225 Asylum Street
Hartford, CT 06103
(860) 522-6103
BBO# 636731
Attorney for the Defendant

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

The undersigned attorney certifies that prior to filing the present motion, he conferred with plaintiff's counsel, Mr. Paul Nathan, by telephone and attempted in good faith to narrow or resolve this issue. The undersigned has determined that Attorney Nathan does not object to this motion.


N. Kane Bennett

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record of each party on January 28, 2005.

Paul Nathan, Esq.
Nathan & Pasquina
159 Derby Street
Salem, MA 01970
(978) 745-4455
BBO#367420

A handwritten signature in black ink, appearing to read 'NKB', is written over a horizontal line.

N. Kane Bennett, Esq.
Halloran & Sage, LLP
BBO #636731

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AFFIDAVIT OF MELISSA ROTENBERG ARCARO

I, Melissa Rotenberg Arcaro, Esq., depose and state the following:

1. I am a senior associate with the law firm of Halloran & Sage LLP,
One Goodwin Square, 225 Asylum Street, Hartford, CT 06103.
2. I was admitted to practice law in the state of Connecticut in 1995. I
was also admitted to practice before the United States District
Court for the District of Connecticut in 1996.
3. There are no disciplinary proceedings against me in any
jurisdiction.
4. I have never been reprimanded, suspended, placed on inactive
status, disbarred nor resigned from the practice of law in any
jurisdiction.

5. I am associated in this matter with N. Kane Bennett, of the law firm of Halloran & Sage LLP, who will serve as local counsel in this matter. Mr. Bennett is admitted to practice law before this Court.
6. I am familiar with the issues presented in this litigation. I have served as defense counsel for the defendant in several matters. I respectfully submit that my participation as counsel in this case will expedite the orderly presentation of evidence and serve the interests of judicial economy.
7. I am familiar with the jurisdictional provisions of Title 28 U.S.C., the Federal Rules of Civil Procedure, and the Local Rules of this Court.
8. Accordingly, I respectfully request that my application to appear pro hac vice be granted.

I certify that the foregoing statements made by me are true and that I am aware that if any of the foregoing statements made by me are willfully false I am subject to punishment.

1-23-05
Date

Melissa Rotenberg Arcaro
Melissa Rotenberg Arcaro

Sworn to me this 28 day of January, 2005

[Signature]
Notary Public

My Commission expires: 6/30/05